



Mayflower Wind Energy LLC
2 Dry Dock Avenue, Suite 500
Boston, MA 02210

February 25, 2021

MA 83C III RFP Drafting Team

Massachusetts Electricity Distribution Companies & Department of Energy Resources

RE: Request for Public Comment on MA 83C III Draft Requests for Proposals for Long-Term Contracts for Offshore Wind Energy Projects

Dear MA 83C III RFP Drafting Team,

Mayflower Wind Energy applauds the Electricity Distribution Companies and the Massachusetts Department of Energy Resources for their hard work in drafting the latest round of long-term offshore wind contract solicitations. It is clear, now more than ever, that we must all do our part in preventing climate change. Massachusetts' 83C solicitation processes serve as a model for the nascent offshore wind industry to follow, and Mayflower is honored and excited to participate.

In general, we agree with the language and guidance in the Draft RFP and offer the following thoughts in the spirit of seeking clarification. These comments are not ranked or weighted in any order of priority.

We would appreciate the opportunity to comment publicly on the form PPA contracts for both National Grid and Eversource/Unitil before they are submitted to the Massachusetts Department of Public Utilities. Opening those contracts to public comment may shorten the amount of time needed by the winning developer(s) to negotiate a final contract for submission to the DPU. As a party to such negotiations as a part of the MA 83C Round II process, Mayflower can attest to the complicated, back-and-forth nature of negotiating these contracts. Allowing the public to see those contracts ahead of the RFP may hasten negotiation.

We recommend rewording the proposed *PPA Provision vi* so that it does not bind a seller of RECs to the offer of a single buyer. Instead, we recommend language that ensures the buyer must match the aggregation of bona fide Alternative Offers if the seller seeks to sell RECs to more than one third party. We infer from *Provision vi* that the seller must sell to the buyer unless there is a *single* alternative buyer whose offer exceeds the REC value. Our proposed change contemplates a situation in which multiple alternative buyers produce Alternative Offers which, in aggregate, exceed the REC value.

We believe that the replacement of delivered energy will only be required in exceptional circumstances. Accordingly, we propose allowing developers the flexibility to procure other forms of energy if, for example, the developer's project is down for some time, to meet the terms of the PPA contract. Mayflower is certainly wary of a counterargument that this may lead to a wholesale abandonment of offshore wind under the correct circumstances; we would therefore propose a cap (to be determined by the Drafting team) on alternative forms of delivered energy be put into place. Such a provision would provide flexibility to the developer and consequently security to the grid and ultimately to Massachusetts ratepayers.

Mayflower asks the Drafting team to please detail further section 2.2.1.7 *b* regarding a Plan for Transmission System Upgrades. ISO-NE is the ultimate authority on any transmission system upgrades, so at best, any developer plan as a part of this RFP will be based on partial knowledge. ISO-NE will consider not only each developer's required upgrades, but also the interplay between multiple developers and the existing system. We recommend the Drafting Team consider indicating more specifically the purpose of this section, adding additional language describing what the evaluation team is looking for, or alternatively removing the section altogether.

While we appreciate the merits of a Deliverability Study (Section 2.2.1.8.1), Mayflower feels that latent system upgrades required to enable large-scale offshore wind interconnection into ISO-NE will result in an excessive cost on developers. The Deliverability Study is useful only at the moment it is executed; as soon as another grid connection is requested, the value of the study is diminished.

Mayflower proposes that the output of the study be used as a fixed component cost in a developer's bid. As grid upgrade costs change (potentially because of a future grid connection), Mayflower proposes a cost recovery mechanism be included in the RFP. This will ameliorate

many of the latent system upgrade costs identified in these studies that will be triggered as the grid continues to evolve.

Once again, Mayflower Wind is encouraged that the Drafting and Evaluation teams are interested in public comment for the 83C Round III solicitation. We are very happy to explain our comments in further detail, if requested; we welcome continued dialogue between developers and the RFP drafting team. We look forward to additional opportunities to provide input in this process, and once the public comment period is complete, to the full release of the solicitation documents.

Sincerely,

A handwritten signature in black ink, appearing to read "MB".

Michael Brown
Chief Executive Officer, Mayflower Wind Energy LLC